

**GUIDELINES AND OPERATING PROCEDURES FOR THE
USE OF
THE DOE SUBCONTRACTING REPORTING SYSTEM
(SRS)**

February 2004

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1. **PURPOSE**

To establish guidelines for use of the Department of Energy Subcontracting Reporting System (SRS) and for the Subcontracting Reporting Standard Forms 294 and 295. These guidelines supplement and implement procedural aspects of the Federal Acquisition Regulation (FAR) 19.7, FAR clause 52.219-8 and Section 8(d) of the Small Business Act (15 U.S.C. 637(d)).

2. **DEFINITIONS**

“Subcontracting Reporting System (SRS)” is a web-based system to automate the processing of the subcontract reports SF 294 (Subcontract Report for Individual Contracts) and SF 295 (Summary Subcontract Report) in order to expedite the timeliness of the submission and assure the validity and reliability of small business data used in socioeconomic goal reporting to the Office of Federal Procurement Policy and the Small Business Administration.

“Standard Form 294 (SF 294)” is the “Subcontracting Report for Individual Contracts” that shows the contractor’s achievements on each contract as measured against the goals in its subcontracting plan for that contract. The reporting period for the SF 294 begins with the inception of the contract and the information to be provided on each report is cumulative for the life of that contract. The submission of this form to the DOE is semi-annual for periods ending March 31st and September 30th. In accordance with the form’s instructions, “other-than-small” business prime contractors and subcontractors must submit a SF 294 that: (a) hold a contract over \$500,000 (over \$1,000,000 for construction of a public facility), and (b) are required to report subcontracts awarded to Small Business (SB), Small Disadvantaged Business (SDB), Women-Owned Small Business (WOSB), Veteran-Owned Small Business (VOSB), Service-Disabled Veteran-Owned Small Business, and HUBZone Small Business concerns under a subcontracting plan. **The SF 294 is not required if the company is operating under a traditional commercial products plan. A SF 295 is required for companies operating under a commercial products plan.**

“Standard Form 295 (SF 295)” is the “Summary Subcontract Report” that summarizes the contractor’s subcontracting activity with DOE during the reporting period only. It is important to note that the SF 295 does not cumulatively sum the individual SF 294 report, since indirect dollars and other subcontract dollars are reported through the SF 295. The SF 295 is submitted once a year (by October 30th for the previous fiscal year ended on September 30th). In accordance with the form’s instructions, “other-than-small” business prime contractors and subcontractors, [in the case of all types of commercial products and services (refer to Commercial Item definition below)], must file annually a SF 295 if they: (a) hold a contract over \$500,000 (over 1,000,000 for construction of a public facility) and (b) are required to report subcontracts awarded Small Business (SB), Small Disadvantaged Business (SDB), Women-Owned Small

Business (WOSB), Veteran-Owned Small Business (VOSB), Service-Disabled Veteran-Owned Small Business, and HUBZone Small Business concerns under a subcontracting plan.

"Commercial item" means--

(a) Any item, other than real property that is of a type customarily used for nongovernmental purposes and that--

(1) Has been sold, leased, or licensed to the general public; or

(2) Has been offered for sale, lease, or license to the general public;

(b) Any item that evolved from an item described in paragraph (a) of this definition through advances in technology or performance and that is not yet available in the commercial marketplace, but will be available in the commercial marketplace in time to satisfy the delivery requirements under a Government solicitation;

(c) Any item that would satisfy a criterion expressed in paragraphs (a) or (b) of this definition, but for--

(1) Modifications of a type customarily available in the commercial marketplace; or

(2) Minor modifications of a type not customarily available in the commercial marketplace made to meet Federal Government requirements. Minor modifications mean modifications that do not significantly alter the nongovernmental function or essential physical characteristics of an item or component, or change the purpose of a process. Factors to be considered in determining whether a modification is minor include the value and size of the modification and the comparative value and size of the final product. Dollar values and percentages may be used as guideposts, but are not conclusive evidence that a modification is minor;

(d) Any combination of items meeting the requirements of paragraphs (a), (b), (c), or (e) of this definition that are of a type customarily combined and sold in combination to the general public;

(e) Installation services, maintenance services, repair services, training services, and other services if such services are procured for support of an item referred to in paragraphs (a), (b), (c), or (d) of this definition, and if the source of such services--

(1) Offers such services to the general public and the Federal Government contemporaneously and under similar terms and conditions; and

(2) Offers to use the same work force for providing the Federal Government with such services as the source uses for providing such services to the general public;

(f) Services of a type offered and sold competitively in substantial quantities in the commercial marketplace based on established catalog or market prices for specific tasks performed under standard commercial terms and conditions. This does not include services that are sold based on hourly rates without an established catalog or market price for a specific service performed;

(g) Any item, combination of items, or service referred to in paragraphs (a) through (f), notwithstanding the fact that the item, combination of items, or service is transferred between or among separate divisions, subsidiaries, or affiliates of a contractor; or

(h) A nondevelopmental item, if the procuring agency determines the item was developed exclusively at private expense and sold in substantial quantities, on a competitive basis, to multiple State and local governments. FAR 2.101

“Subcontract” means a contract or contractual action entered into by a prime contractor or subcontractor for the purpose of obtaining supplies, materials, equipment, or services of any kind under a prime contract. FAR 3.502-1

“Subcontracting Plan” is a plan, adopted by a contractor, to further the Government’s program under the Small Business Act by subcontracting parts of the contract work. Successful offerors under both negotiated and sealed bidding acquisitions that are expected to exceed \$500,000 (or \$1,000,000 for construction) and that have subcontracting possibilities must provide formal subcontracting plans. 15 U.S.C. 637(d)

“Small Business Act” is an Act, 15 U.S.C. 631 et seq., which in 1963 created the Small Business Administration (SBA). The SBA is jointly responsible with the federal procuring agencies for promoting policies and taking actions to ensure that Small Business Concerns and Small Disadvantaged Business Concerns obtain their fair share of Government procurements. In 1978, amendments to this Act gave added emphasis to the 8 (a) Program by providing for business development assistance and requiring prime contractors to submit formal plans for subcontracting to small, small disadvantaged, and 8(a) firms.

“Commercial Plan” means a subcontracting plan (including goals) that covers the offeror's fiscal year and that applies to the entire production of commercial items sold by either the entire company or a portion thereof (e.g., division, plant, or product line); FAR 19.701.

"Failure to make a good faith effort to comply with the subcontracting plan" means willful or intentional failure to perform in accordance with the

requirements of the subcontracting plan, or willful or intentional action to frustrate the plan.

3. FAR 19.702 STATUTORY REQUIREMENTS

“Any contractor receiving a contract whose value is more than the simplified acquisition threshold must agree in the contract that small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns will have the maximum practicable opportunity to participate in contract performance consistent with its efficient performance. It is further the policy of the United States that its prime contractors establish procedures to ensure the timely payment of amounts due pursuant to the terms of their subcontracts with small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns.

(a) Except as stated in paragraph (b) of this section, Section 8(d) of the Small Business Act (15 U.S.C. 637(d)) imposes the following requirements regarding subcontracting with small businesses and small business subcontracting plans:

(1) In negotiated acquisitions, each solicitation of offers to perform a contract or contract modification, that individually is expected to exceed \$500,000 (\$1,000,000 for construction) and that has subcontracting possibilities, shall require the apparently successful offeror to submit an acceptable subcontracting plan. If the apparently successful offeror fails to negotiate a subcontracting plan acceptable to the contracting officer within the time limit prescribed by the contracting officer, the offeror will be ineligible for award.

(2) In sealed bidding acquisitions, each invitation for bids to perform a contract or contract modification, that individually is expected to exceed \$500,000 (\$1,000,000 for construction) and that has subcontracting possibilities, shall require the bidder selected for award to submit a subcontracting plan. If the selected bidder fails to submit a plan within the time limit prescribed by the contracting officer, the bidder will be ineligible for award.

(b) Subcontracting plans (see paragraphs (a)(1) and (2) of this section) are not required-

(1) From small business concerns;

(2) For personal services contracts;

(3) For contracts or contract modifications that will be performed entirely outside of any State, territory, or possession of the United States, the District of Columbia, and the Commonwealth of Puerto Rico; or

(4) For modifications to contracts within the general scope of the contract that do not contain the clause at 52.219-8, Utilization of Small Business Concerns (or

equivalent prior clauses; *e.g.*, contracts awarded before the enactment of Public Law 95-507).

(c) As stated in 15 U.S.C. 637(d)(8), any contractor or subcontractor failing to comply in good faith with the requirements of the subcontracting plan is in material breach of its contract. Further, 15 U.S.C. 637(d)(4)(F) directs that a contractor's failure to make a good faith effort to comply with the requirements of the subcontracting plan shall result in the imposition of liquidated damages.

4. SUBCONTRACTING REPORTING SYSTEM (SRS)

The Department of Energy's Subcontracting Reporting System (SRS) tracks the small business results for DOE's contractors from data contained on Standard Forms 294 and 295. The SRS is available for recording and reporting subcontracting data.

The SRS is a web-based application, and it eliminates the shipment of paper between contractors and Heads of Contracting Activities (HCA), and between HCAs and Headquarters. The contractor will enter the forms via a World Wide Web browser, and the data will flow from the contractor to the HCA and from the HCA to Headquarters via the Internet. Accordingly, the reporting, transmission, approval, and -- when necessary--correction of data will be considerably simpler and quicker. HCA approval is required for the data to be included in the DOE consolidated report that is transmitted to Headquarters and from Headquarters to the Small Business Administration.

The SRS has been designed to conform to the latest versions of SF-294 and 295. The SRS program performs the necessary calculations to produce appropriate summary fiscal year data. Standard reports are also available to interested parties throughout DOE.

System Registration

Contractors, DOE staff that review and approve contractor reports, and DOE users who wish to run SRS reports must register before they will be able to access or use any part of the system. The registration screen for the SRS is the same for all SRS users. Additionally, registration must be approved by a user at the next higher level before the system may be accessed. Contractor registrations are approved by the HCA, and HCA and DOE User registrations are approved by the Headquarters SRS Manager.

The required fields on the registration form differ slightly, depending on the role of the person registering. Currently, there are four roles defined in the SRS: Contractor, HCA, DOE Headquarters (SRS Manager), and DOE User. The different fields required by each role are discussed below as each role is described.

Roles

“Contractor” is any Contractor, either a Prime or on behalf of a Subcontractor, who must create, update and submit SF294/SF295 reports. The Contractor will register in the system under the “Contractor Role” using their DUNS Number. Registration with the correct DUNS number is critical. Satisfaction of statutory reporting requirements and the determination of socioeconomic procurement goal achievements are based on correct reporting of DUNS numbers. The Contractor will choose their own login ID and password. Contractors will also need to choose from a list of HCAs the one that reviews their reports. This registration must be approved by the cognizant HCA before access to the SRS is granted. Contractors will be emailed automatically when their registration is approved.

The Contractor has several responsibilities: create and submit semi-annual/annual reports using Standard Forms 294/295, review the status of reports submitted to the HCA, revise or correct reports returned by HCA, manage the user profiles, and provide any feedback to the SRS Manager. The Contractor’s homepage on SRS presents a summary of total reports in progress (“Total Items in Your Work List”) and the subset of those reports that may have been returned by the HCA for rework (“Items Requiring Attention”). A number of actions may be performed on reports that are displayed in the contractor’s work list. Actions include **assigning** a user to each report; this must be done before the report can be created. Other actions include **update**, **delete**, **submit** and **unassign**. The work list is shared by all registered users associated with a particular DUNS number. Thus, it is possible for company personnel either in corporate headquarters or at the place of performance to report data to SRS. Further information on these actions will be found in the SRS Tutorial.

From the Contractor Home Menu, a series of menus is available which allows the contractor to:

- **select** the appropriate SF,
- **select a specific contract** (in the case of the SF 294),
- **create** a new report, either as the prime contractor or on behalf of a subcontractor,
- **review** the status of reports submitted to the HCA,
- **revise** or correct a report that has been returned by the HCA,
- look at a **history of reports** submitted to DOE,
- look at the **history of actions** taken on a specific report, or
- **use the utility menu** to change their profile, provide feedback to the SRS Manager, or obtain SRS help.

“Head of Contracting Activity” is any user in a Contracting Activity authorized to review and approve subcontract reports submitted to the HCA. All HCA users must first register with SRS. This means that each Contracting Activity must decide how they wish to manage both the contractor registration and the subcontract report review and approval processes. For example, if the HCA determines that Contracting Officers and/or Contract Specialists will review the reports, then those persons must register. If the Small and Disadvantaged Business Utilization Specialist will review reports, then that person must register. Whoever approves the contractor’s initial registration must also be a registered user. The HCA user will choose their own login ID and password and will also need to choose their HCA reports from a drop down menu.

Following login to the system, the HCA Home Page will indicate the types and number of Standard Forms (SF) that have been submitted by contractors within the HCA and are awaiting either initial or second review (Total Reports in Work list), as well as the number of SFs that have been resubmitted following rework by the contractor (Reports Requiring Attention). As mentioned earlier, registration by contractors must also be approved by their cognizant HCA before that contractor can use the system. Whenever there are contractor registration requests or reports that require approval by the cognizant HCA, they will show up on the Home Page.

Communications between DOE and its contractors are facilitated via built-in email functions. Initial registration requires the entry of each user’s email address. These addresses are used to notify users automatically that their request for registration has been received, as well as when it has been approved or rejected. If for some reason the HCA does not approve the contractor’s registration, they have the option of sending a message back to the contractor along with the automatic email rejection notice. That message provides DOE an opportunity to explain the rejection, request additional information, or otherwise communicate with the contractor.

There are many standard reports available to the HCA. These include both summary and detailed data. Summary reports provide information on the total amount of subcontracting with small, small disadvantaged and small women-owned businesses. Subcontract goal achievement data are also available in summary reports. Options for summary reports available to the HCA include: awarding office, HCA, initiating (program) office, or DOE-wide. Totals are available by fiscal year and semi-annual time period, by Management and Operating (M&O) vs. non-M&O contracts, for all prime contracts, for subcontracts only, or for all contractors and subcontractors.

Detailed reports on the subcontracting activity of individual contractors are available only to HCA users. These reports also include both dollar awards and

goal achievement. Finally, a number of management reports--such as timeliness of reporting, missing reports, and a history of semi-annual reports are also included in SRS.

The utilities menu allows HCA users to manage their profile (password, email address, etc.) and send feedback to the SRS System Manager. There are three pre-set choices. The user may report a bug, request an enhancement, or simply make a comment. The system automatically picks up the user's email address from the loginID, and includes it in the message. Following receipt of the feedback at Headquarters, the SRS Manager and/or the system support team will take appropriate action.

Each Contracting Activity is responsible for establishing standard operating procedures for use by procurement, small business, and program personnel who will be involved in the management of subcontracting reporting. At a minimum, these procedures should address:

1. Initial contact with contractor to provide information on the use of SRS. Instructions for registration and training (if needed) will be the responsibility of the HCA.
2. Responsibility for reviewing and approving contractor registrations. Will contracting or small business specialists (or both) handle this? Who will have primary cognizance and who will be the backup?
3. Responsibility for reviewing and approving (or rejecting) semi-annual reports submitted by contractors. Same questions as above.
4. Preparation of management reports from SRS. The system provides visibility into late and missing reports from contractors. Reports may be run close to and after the due date to determine if any are missing.
5. Compilation of statistics on socioeconomic procurement preference awards. SRS reports can assist program officials and small business and contract specialists in developing subcontract goals and monitoring achievement.
6. Public inquiries. Who at the contracting activity should respond to requests for subcontract data?

“DOE User” is not involved with the processing of subcontract reports and can only obtain summary reports from SRS. The DOE User will have to register in SRS before they can access the report functions. The Headquarters SRS Manager approves all DOE User registrations. The DOE user will choose their own login ID and password.

“Headquarters SRS Manager” is responsible for the proper functioning of the system. The Manager must:

1. Be cognizant of changes in statutory or regulatory reporting requirements,
2. Work with Small Business Program Managers to ensure that complete and

- accurate reports are submitted in a timely manner,
3. Direct the work of the system's technical support team,
 4. Monitor and act on feedback provided by contractors and DOE staff, and
 5. Conduct day-to-day maintenance as needed.

An example of this last task is the processing of requests for registration from HCA and other DOE users. As with contractor registrations processed by HCA's, an email notice of the action taken by the SRS Manager is automatically sent to the person requesting the registration.

5. **STANDARD FORM 294**

General Instructions provided with the SF 294 form:

1. This report **is not** required from small businesses.
2. This report **is not** required for commercial items for which a commercial plan has been approved. The SF 295 is required for contractors operating under this condition and should be submitted to the Government in accordance with the instructions on that form.
3. This form collects accumulative subcontract award data from prime contractors/subcontractors that: (a) hold a contract over \$500,000 (over \$1,000,000 for construction of a public facility) and (b) are required to report subcontracts awarded to Small Business (SB), Small Disadvantaged Business (SDB), Women-Owned Small Business (WOSB), Veteran-Owned Small Business (VOSB), Service-Disabled Veteran-Owned Small Business, and HUBZone Small Business concerns under a subcontracting plan. This form also collects subcontract award data for Historically Black Colleges and Universities (HBCUs) and Minority Institutions (MIs)
4. This report is required for each contract containing a subcontracting plan and must be submitted to the contracting officer semi-annually during contract performance for the periods ending March 31st and September 30th. A separate report is also required for each contract at contract completion. Reports are due 30 days after the close of each reporting period unless otherwise directed by the contracting officer. **Reports are required when due, regardless of whether there has been any subcontracting activity since the inception of the contract or since the previous report.**
5. Only subcontracts involving performance in the U.S. or its outlying areas should be included in the report.
6. **Purchases from a corporation, company, or subdivision that is an affiliate of the prime/subcontractor are not included in this report.**
7. Subcontract award data reported on this form by prime

contractors/subcontractors shall be limited to awards made to their immediate subcontractors. **Credit cannot be taken for awards made to lower tier subcontractors.**

6. **STANDARD FORM 295**

General Instructions provided with the SF 295 form:

1. This report is not required from small businesses.
2. This form collects subcontract award data from prime contractors/subcontractors that: (a) hold a contract over \$500,000 (over \$1,000,000 for construction of a public facility), and (b) are required to report subcontracts awarded to Small Business (SB), Small Disadvantaged Business (SDB), Women-Owned Small Business (WOSB), Veteran-Owned Small Business (VOSB), Service-Disabled Veteran-Owned Small Business, and HUBZone Small Business concerns under a subcontracting plan. This form also collects subcontract award data for Historically Black Colleges and Universities (HBCU's) and Minority Institutions (MI's).
3. This report must be submitted annually (for the twelve months ended September 30th), except for contracts covered by an approved Commercial Plan. (See the following special instructions for those with a Commercial Plan). Reports are due 30 days after the close of the reporting period.
4. This report may be submitted on a corporate, company, or subdivision (e.g., plant or division operating on a separate profit center) basis, unless otherwise directed by the Department of Energy.
5. If a prime contractor/subcontractor is performing work for more than one Federal agency, **a separate report shall be submitted to each agency covering only that agency's contracts.**
6. Only subcontracts involving performance in the U.S. or its outlying areas should be included in the report.
7. **Purchases from a corporation, company, or subdivision that is an affiliate of the prime/subcontractor are not included in this report.**
8. Subcontract award data reported on this form by prime contractors/subcontractors shall be limited to awards made to their immediate subcontractors. **Credit cannot be taken for awards made to lower tier subcontractors.**

SF 295 SPECIAL INSTRUCTIONS FOR COMMERCIAL PLANS

1. This report is due on October 30th each year for the previous fiscal year ended September 30th.
2. The annual report submitted by reporting organizations that have an approved company-wide annual subcontracting plan for commercial items shall include all subcontracting activity under commercial plans in effect during the year, and shall be submitted in addition to the required reports for other-than-commercial items, if any. This report must be submitted to each agency from which contracts for commercial items covered by an approved Commercial Plan were received.

7. FREQUENTLY ASKED QUESTIONS

1. How do I gain access to SRS?

SRS is a web-based system and can be reached by clicking on the following URL: <http://www1.pr.doe.gov/srs/>. To access the system, the user must first register. Once registered, the registration will be reviewed by the SRS Manager for approval. If approved, an email will be sent out to the user confirming access to the system.

2. Is there a demo site for SRS so I can practice entering SF 294 and 295 report?

Yes, the URL for the web site is <http://www1.pr.doe.gov/srsdemo/>. This demo site allows the user to experience three different roles: Contractor, HCA, and SRS Manager. For example: the user can go into the site as a contractor, submit a SF 294 and then change roles and approve the report as if they were the HCA.

Here are three demo logins available:

Enter "ctrdemo" and "test01" on the login page to login as a Contractor.

Enter "hcademo" and "test01" on the login page to login as an HCA.

Enter "sysman" and "sysman" on the login page to login as HQ.

3. Why do the contractors need to list North American Industry Codes (NAICS) on the SF 295?

Federal Government agencies that collect establishment based statistics are now required to collect NAICS. NAICS identify the type of industry and size of business of the subcontractors offering more statistical insight for Small Business Administration when analyzing subcontracting.

4. If the contractor submits their SF 295 electronically through SRS, will they still need to send a signed hardcopy of the SF 295?

Please consult with the Contracting Officer who has cognizance for the contract in question. They will provide guidance on the matter. When the government-wide subcontracting reporting system is operational, there will be no requirement for signed hardcopies.

5. When will the government-wide subcontracting system be operational?

The current timeline from OMB indicates a system in place by October 2004 to receive SF 295 for FY04. The SF 294 for FY04 will be entered into the DOE SRS.

6. Can Award Bin Numbers from 'legacy' contracts with -ENG- configured in, be used in SRS?

No, these old Award Bin Numbers can not be used in SRS. With the implementation of PADSSWeb, the decision to convert these six contracts to the standard, uniform Award Bin format was made in October 2002. Below on the left is the legacy Award Bin Number and on the right, the converted Award Bin Number.

<u>‘Legacy’ Award Bin</u>	<u>PADSSWeb Award Bin</u>
W-7405-ENG-82	AC02-43CH00082
W-7405-ENG-92	AC02-43CH00092
W-31109-ENG-38	AC02-40CH00038
W-7405-ENG-48	AC03-40SF00048
W-7405-ENG-36	AC04-43AL00036

7. Why does the DUNS Number I use for my reports not match the DUNS Number in SRS?

SRS is populated with the contract and contractor information from PADS. If PADS does not have the correct information then SRS information will be incorrect. Please correct the information in PADS first and then contact the SRS Manager for any corrections needed in SRS.

Just a reminder, the government-wide subcontracting system will collect contractor information from the Central Contractor Registration (CCR). It is important that all contractors register with this system and verify that their information is correct.

8. Occasionally, a contractor will not have any subcontracting activity during the contract performance period. If there is no subcontracting activity, does the contractor still have to submit a SF 294?

Reports are required when due, regardless of whether there has been any subcontracting activity since the inception of the contract or since the previous report.

9. In case of a novation, how can the contractor name be changed in SRS.

First, PADS needs to be updated with the new contractor name. Then call the SRS Manager explaining when the name was changed in PADS. The SRS Manager will make sure the information is changed in SRS. Please have the contract number and old contractor name available to give the SRS Manager. The changes should not affect the historical data available since SRS tracks the reports by DUNS Numbers and contract numbers.

10. How can I get my ID and/or password if I forget them?

Call or email the SRS Manager for that information.

11. How can I get a user removed from the system?

Call or email the SRS Manager with the request.

12. What if the contractor has no more subcontracting opportunities, but the contract is not finished, do they still need to send in SF 294 or 295 reports?

The CO for these contracts will need to do a Determination and Findings to indicate the subcontracting changes with these contracts. Then PADS will need to be changed with a new IPAR that states there is no subcontracting. Please inform the Subcontracting Administrator in your office that these contracts no longer need subcontracting plans.

13. Why do I keep getting calls from the SRS Manager wanting subcontracting reports on contracts that do not have subcontracting plans?

This could be due to incorrect reporting on the IPAR. SRS is populated with contract information from PADS. If an IPAR report indicates that a contract has a subcontracting plan, then that contract information is submitted to SRS. The SRS Manager will assume these contracts must have subcontracting reports.

14. Do I need to submit a SF 294 and 295 reports for each prime and subcontractors?

In the SF-295, the contractor would submit one report for itself as a "prime" and another for all subcontracts aggregated (or rolled up) as a "subcontract" report.

In the SF-294, however, the contractor submits one report for itself and as many others sub reports that the contractor wishes to enter. In the SF-294, the contractor enters the name and address of those subs.